

# Statement of Basis of the Federal Operating Permit

Valero Energy Partners LP

Site Name: Valero Three Rivers Refinery  
Area Name: Valero Three Rivers Terminal Services Facility  
Physical Location: 301 West Leroy Street  
Nearest City: Three Rivers  
County: Live Oak

Permit Number: O3932  
Project Type: Initial Issuance

The North American Industry Classification System (NAICS) Code: 324110  
NAICS Name: Petroleum Refineries

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). An application for initial permit issuance has been submitted in accordance with 30 TAC § 122.201. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: December 19, 2018

## Operating Permit Basis of Determination

### Permit Area Process Description

The Valero Three Rivers Terminal Services facility is comprised of sixty-two (62) storage tanks and related equipment leak fugitive components. The storage tanks are used to store crude oil from pipeline and tank trucks, as well as intermediate, and final products produced from the Valero Three Rivers Refinery operating under FOP O1450. Planned Maintenance, Startup and Shutdown (MSS) emissions associated with this equipment are authorized under TCEQ's New Source Review (NSR) Permit Nos. 141533 and PSDTX1017M1.

### FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1450

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO <sub>2</sub> , PM, NO <sub>x</sub> , HAPS, CO
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### Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan

- Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that

compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

**Acronym list.** This attachment lists the common acronyms used when discussing the FOPs.

#### Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

#### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are

burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

The applicant opted to comply with the more stringent 20% opacity standard under 30 TAC § 111.111(a)(1)(B) for all stationary vents that are subject to the 30% opacity standard under 30 TAC § 111.111(a)(1)(A).

### Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO <sub>2</sub> Trading Program)	No

### Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

### Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for

the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TKEFR	40 CFR Part 63, Subpart CC	63CC-HIVP	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = External floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p> <p>Seal Type = Two seals, one above the other, the primary seal being a metallic shoe seal</p>
GRP-TKEFR	40 CFR Part 63, Subpart CC	63CC-LOVP	<p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.</p> <p>Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.</p>
GRP-TKFXR1	40 CFR Part 63, Subpart CC	63CC	<p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.</p> <p>Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.</p>
GRP-TKFXR2	40 CFR Part 60, Subpart Kb	60Kb	<p>Product Stored = Petroleum liquid (other than petroleum or condensate)</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
GRP-TKFXR2	40 CFR Part 63, Subpart CC	63CC-01	<p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.</p> <p>Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.</p>
GRP-TKHON	40 CFR Part 63, Subpart G	63G-2SEAL	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the floating roof</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
GRP-TKHON	40 CFR Part 63, Subpart G	63G-LOVP	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
GRP-TKHON	40 CFR Part 63, Subpart G	63G-MSS	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Metallic shoe seal (as defined in 40 CFR § 63.111)</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
GRP-TKHON	40 CFR Part 63, Subpart G	63G-Y2SEAL	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the floating roof</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
GRP-TKHON	40 CFR Part 63, Subpart G	63G-YMSS	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Metallic shoe seal (as defined in 40 CFR § 63.111)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
GRP-TKIFR1	40 CFR Part 63, Subpart CC	63CC-2SEAL	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Fixed roof and an internal floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p> <p>Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely cover the space between the wall of the storage vessel and the edge of the internal floating roof</p>
GRP-TKIFR1	40 CFR Part 63, Subpart CC	63CC-LOVP	<p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.</p> <p>Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.</p>
GRP-TKIFR1	40 CFR Part 63, Subpart CC	63CC-MSS	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Fixed roof and an internal floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Seal Type = Metallic shoe seal (as defined in 40 CFR § 63.111)
GRP-TKIFR1	40 CFR Part 63, Subpart CC	63CC-VAPOR	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Fixed roof and an internal floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p> <p>Seal Type = VAPOR-MOUNTED SEAL AS OF DECEMBER 31, 1992</p>
GRP-TKIFR2	40 CFR Part 60, Subpart Kb	60Kb-HIVP	<p>Product Stored = Petroleum liquid (other than petroleum or condensate)</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p>
GRP-TKIFR2	40 CFR Part 60, Subpart Kb	60Kb-LOVP	<p>Product Stored = Petroleum liquid (other than petroleum or condensate)</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
GRP-TKIFR2	40 CFR Part 60, Subpart Kb	60Kb-MIDVP	<p>Product Stored = Petroleum liquid (other than petroleum or condensate)</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p>
GRP-TKIFR2	40 CFR Part 61, Subpart FF	61FF-MSS	Waste Treatment Tank = The tank does not manage, treat or store a waste stream subject to 40 CFR Part 61, Subpart FF.
GRP-TKIFR2	40 CFR Part 63, Subpart CC	63CC-HIVP	<p>Product Stored = Refined petroleum products</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p>
S-200	40 CFR Part 60, Subpart Kb	60Kb	<p>Product Stored = Crude oil stored, processed, and/or treated after custody transfer</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p> <p>Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia</p>
S-200	40 CFR Part 63, Subpart CC	63CC-01	<p>Product Stored = Crude oil</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p> <p>Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia</p>
S-201	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Petroleum liquid (other than petroleum or condensate)</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
S-201	40 CFR Part 60, Subpart Kb	60Kb-2	<p>Product Stored = Crude oil stored, processed, and/or treated after custody transfer</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p> <p>Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia</p>

Unit ID	Regulation	Index Number	Basis of Determination*
S-201	40 CFR Part 63, Subpart CC	63CC-01	<p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.</p> <p>Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.</p>
S-201	40 CFR Part 63, Subpart CC	63CC-02	<p>Product Stored = Crude oil</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = No floating roof</p> <p>Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia</p>
S-310	40 CFR Part 61, Subpart FF	61FF-01	<p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is complying with the alternative standards in 40 CFR § 61.351.</p> <p>Kb Tank Type = Using a fixed roof and internal floating roof, that meets the requirements of 40 CFR § 60.112b(a)(1)</p> <p>Seal Type = Mechanical shoe seal</p>
S-310	40 CFR Part 63, Subpart CC	63CC-2SEAL	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Fixed roof and an internal floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p> <p>Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely cover the space between the wall of the storage vessel and the edge of the internal floating roof</p>
S-310	40 CFR Part 63, Subpart CC	63CC-LOVP	<p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.</p> <p>Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.</p>
S-310	40 CFR Part 63, Subpart CC	63CC-MSS	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Fixed roof and an internal floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p> <p>Seal Type = Metallic shoe seal (as defined in 40 CFR § 63.111)</p>
S-310	40 CFR Part 63, Subpart CC	63CC-VAPOR	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Fixed roof and an internal floating roof</p> <p>Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)</p> <p>Seal Type = VAPOR-MOUNTED SEAL AS OF DECEMBER 31, 1992</p>

Unit ID	Regulation	Index Number	Basis of Determination*
S-354	40 CFR Part 60, Subpart Kb	60Kb-HIVP	<p>Product Stored = Crude oil stored, processed, and/or treated after custody transfer</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal</p> <p>Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia</p>
S-354	40 CFR Part 63, Subpart CC	63CC-HIVP	<p>Existing Source = The storage vessel is at an existing source.</p> <p>Product Stored = Crude oil</p> <p>Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)</p> <p>Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.</p> <p>True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = External floating roof</p> <p>Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.</p> <p>Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal</p> <p>Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia</p> <p>Seal Type = Two seals, one above the other, the primary seal being a metallic shoe seal</p>
FUG-CC-EXT	40 CFR Part 63, Subpart CC	63CC	<p>CLOSED VENT (OR VAPOR COLLECTION) SYSTEMS = NO</p> <p>COMPRESSOR IN HYDROGEN SERVICE = NO</p> <p>ENCLOSED COMBUSTION DEVICE = NO</p> <p>EXISTING SOURCE = YES</p> <p>FLARE = NO</p> <p>OPEN-ENDED VALVES OR LINES = YES</p> <p>PRESSURE RELIEF DEVICE IN GAS/VAPOR SERVICE = YES</p> <p>PRESSURE RELIEF DEVICE IN HEAVY LIQUID SERVICE = YES</p> <p>VACUUM SERVICE = NO</p> <p>VALVES IN HEAVY LIQUID SERVICE = YES</p> <p>VAPOR RECOVERY SYSTEM = NO</p> <p>CLOSED VENT (OR VAPOR COLLETION) SYSTEMS EQUIVALENT EMISSION LIMITATION = YES</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>COMPLYING WITH TITLE 40 CFR 60 SUBPART VV = YES</p> <p>COMPRESSOR NOT IN HYDROGEN SERVICE = NO</p> <p>EQUIVALENT EMISSION LIMIT = NO</p> <p>OPEN-ENDED VALVES OR LINES EQUIVALENT EMISSION LIMITATION = NO</p> <p>PRESSURE RELIEF DEVICE COMPLYING WITH § 60.482-4(A)-(B) = YES</p> <p>PUMP IN LIGHT LIQUID SERVICE = YES</p> <p>VALVES IN HEAVY LIQUID SERVICE EQUIVALENT EMISSION LIMITATION = NO</p> <p>PRESSURE RELIEF DEVICES IN LIGHT LIQUID SERVICE = YES</p> <p>PUMP EQUIVALENT EMISSION LIMITATION = NO</p> <p>CLOSED VENT (OR VAPOR COLLETION) SYSTEMS COMPLYING WITH § 60.482-10 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>EQUIVALENT EMISSION LIMIT = NO</p> <p>OPEN-ENDED VALVES OR LINES COMPLYING WITH § 60.482-6 = YES</p> <p>VALVES IN HEAVY LIQUID SERVICE COMPLYING WITH § 60.482-8 = YES</p> <p>FLANGES AND OTHER CONNECTORS = YES</p> <p>PUMP COMPLYING WITH § 60.482-2 = YES</p> <p>SAMPLING CONNECTION SYSTEMS = YES</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE = YES</p> <p>COMPLYING WITH §60.482-8 = YES</p> <p>FLANGES AND OTHER CONNECTORS EQUIVALENT EMISSION LIMITATION = NO</p> <p>PUMP IN HEAVY LIQUID SERVICE = YES</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE EQUIVALENT EMISSION LIMITATION = NO</p> <p>PUMP EQUIVALENT EMISSION LIMITATION = NO</p> <p>FLANGES AND OTHER CONNECTORS COMPLYING WITH § 60.482-8 = YES</p> <p>SAMPLING CONNECTION SYSTEMS COMPLYING WITH § 60.482-5 = YES</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE COMPLYING WITH § 60.482-7 = YES</p> <p>PUMP COMPLYING WITH § 60.482-8 = YES</p>
FUG-CC-NEW	40 CFR Part 63, Subpart CC	63CC	<p>ANY (INSTRUMENTATION SYSTEMS) = NO</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = YES</p> <p>ENCLOSED COMBUSTION DEVICES = NO</p> <p>EXISTING SOURCE = YES</p> <p>LIGHT LIQUID SERVICE (NON-RECIPROCATING PUMPS) = YES</p> <p>ANY (CLOSED-VENT SYSTEMS) = NO</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>COMPLYING WITH TITLE 40 CFR 60 SUBPART VV = NO</p> <p>HEAVY LIQUID SERVICE (NON-RECIPROCATING PUMPS) = YES</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = YES</p> <p>AMEL = NO</p> <p>FLARES = NO</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = YES</p> <p>HYDROGEN SERVICE (COMPRESSORS) = FUGITIVE UNIT HAS NO COMPRESSORS IN HYDROGEN SERVICE</p> <p>MONITORING CONNECTORS (VALVES) = YES</p> <p>NOT IN HYDROGEN SERVICE (COMPRESSORS) = NO</p> <p>CLOSED VENT SYSTEM, BYPASS LINES = NO</p> <p>GAS/VAPOR SERVICE (PRESSURE RELIEF DEVICES) = YES</p> <p>LEAKLESS PHASE III VALVES = NO</p> <p>HEAVY LIQUID SERVICE (VALVES) = YES</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = YES</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = YES</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = YES</p> <p>MONITORING VALVES (CONNECTORS) = YES</p> <p>SUBPART H PROGRAM (CONNECTORS) = YES</p> <p>RANDOM 200 (CONNECTORS) = NO</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = YES</p>
FUG-GGG	40 CFR Part 60, Subpart GGG	60GGG-01	<p>ANY COMPRESSORS = NO</p> <p>CLOSED VENT (OR VAPOR COLLECTION) SYSTEMS = NO</p> <p>CONSTRUCTION/MODIFICATION DATE = AFTER JANUARY 4, 1983</p> <p>ENCLOSED COMBUSTION DEVICE = NO</p> <p>EQUIPMENT IN VACUUM SERVICE = NO</p> <p>FLANGES AND OTHER CONNECTORS = YES</p> <p>FLARE = NO</p> <p>SAMPLING CONNECTION SYSTEMS = YES</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE = YES</p> <p>VAPOR RECOVERY SYSTEM = NO</p> <p>AFFECTED FACILITY COVERED BY 40 CFR 60 SUBPARTS VV OR KKK = NO</p> <p>EEL = NO EQUIVALENT MEANS OF EMISSION LIMITATION APPROVED</p> <p>PUMPS IN LIGHT LIQUID SERVICE = YES</p> <p>EEL = NO EQUIVALENT MEANS OF EMISSION LIMITATION APPROVED</p> <p>COMPLYING WITH § 60.482-5 = YES</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>COMPLYING WITH § 60.482-7 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPLYING WITH § 60.482-2 = YES</p> <p>OPEN-ENDED VALVES OR LINES = YES</p> <p>VALVES IN HEAVY LIQUID SERVICE = YES</p> <p>EEL = NO EQUIVALENT MEANS OF EMISSION LIMITATION APPROVED</p> <p>PUMPS IN HEAVY LIQUID SERVICE = YES</p> <p>COMPLYING WITH § 60.482-6 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p>
FUG-HON	40 CFR Part 63, Subpart H	63H	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>DIFFICULT TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p>

\* - The "unit attributes" or operating conditions that determine what requirements apply

## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

#### **New Source Review Authorization References**

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX1017M1	Issuance Date: 08/31/2016
<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 141533	Issuance Date: 08/31/2016
Authorization No.: 147081	Issuance Date: 07/18/2017
Authorization No.: 148266	Issuance Date: 09/29/2017
Authorization No.: 149401	Issuance Date: 12/21/2017
Authorization No.: 150459	Issuance Date: 08/20/2018
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000

## **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

## **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

## **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

### **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: S-201	
Control Device ID No.: S-201-AOS	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-2
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: Thermal oxidizer firebox exit temperature that is measured below 1400 degrees Fahrenheit shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: S-201	
Control Device ID No.: S-201-AOS	Control Device Type: Carbon Adsorption System (Non-Regenerative)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-2
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: A VOC or benzene concentration that is greater than or equal to 100 ppmv or 5 ppmv, respectively, above background, shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>A common way to monitor a non-regenerative carbon adsorption system is by measuring the outlet VOC concentration with a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. An increase in VOC concentration demonstrates when the carbon canister needs to be replaced. This indicator is consistent with the EPA "CAM Technical Guidance Document" (August 1998) and "Periodic Monitoring Technical Reference Guidance Document" (April 1999). Outlet VOC concentration has been used as an indicator of VOC emissions in many federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: S-201	
Control Device ID No.: S-201-AOS	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-2
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Failure to measure or record fugitive emissions from the vapor collection system shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	

Unit/Group/Process Information	
ID No.: S-201	
Control Device ID No.: S-201-AOS	Control Device Type: Carbon Adsorption System (Non-Regenerative)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-2
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Failure to visibly inspect components of the vapor collection system for defects shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

## Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at [https://www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

[https://www.tceq.texas.gov/permitting/air/permitbyrule/air\\_pbr\\_index.html](https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html)

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Historical Standard Exemption lists may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

Additional information concerning PBRs is available on the TCEQ website:

[https://www.tceq.texas.gov/permitting/air/nav/air\\_pbr.html](https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html)

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on November 12, 2018.

Site rating: 2.86 / Satisfactory Company rating: 3.00 / Satisfactory

(*High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55*)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes  
OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes  
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes